

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of:)	
)	
Nationwide Number Portability)	WC Docket No. 17-244
)	
Numbering Policies for Modern Communications)	WC Docket No. 13-97
)	

REPLY COMMENTS OF SPRINT CORPORATION

Sprint Corporation (“Sprint”) hereby files this brief reply to comments submitted in the above captioned proceedings in response to the Federal Communications Commission’s (“FCC” or “Commission”) Notice of Proposed Rulemaking and Notice of Inquiry.¹

First, like most parties that submitted comments, Sprint generally supports a gradual move towards Nationwide Number Portability (“NNP”). Sprint urges the Commission to ensure transition to NNP coincides with the telecommunications industry’s transition to Internet Protocol-based (“IP-based”) networks. As stated by AT&T, “imposing NNP on the PSTN would force providers to waste existing PSTN financial resources upgrading legacy technologies that are already at the trailing edge of their life cycles.”² AT&T thus argues that the Commission should “facilitate NNP *after* the transition to more flexible next generation internet protocol (“IP”)-based networks.”³

¹ *Nationwide Number Portability, Numbering Policies for Modern Communications*, Notice of Proposed Rulemaking and Notice of Inquiry, 32 FCC Rcd 8034 (2017) (NPRM and NOI).

² *See*, Comments of AT&T at pp. 1-2.

³ *Id.* at p. 1 (emphasis added).

Second, NNP should be adopted on a nationwide basis and in a technology/network neutral manner. Sprint does not support different transition timelines for different industry segments. Importantly, Sprint does not support an accelerated timeline for wireless carriers. Rather, Sprint supports an industry-wide, simultaneous transition – wireless, wireline and VoIP providers should all transition on the same timeline. Such a transition is both technologically and competitively-neutral. Further, Sprint supports a nationwide roll-out of NNP. Sprint believes a region-by-region or carrier-by-carrier roll-out would unnecessarily complicate the transition and lead to customer confusion.

Third, Sprint agrees with several commenters including Verizon that commercial agreements between providers could potentially meet the “demand for nationwide number portability while the industry transitions to IP-enabled networks.”⁴ CCA notes that Syniverse and Oracle each today have commercial programs in place that “offer immediate, near-term solutions to NNP.”⁵ These alternative solutions reduce the need for urgency and allow the industry time to carefully overhaul and modernize the nation’s numbering/rating/routing systems.

Fourth, Sprint agrees with CTIA’s comments that the Commission should “await the recommendations of the North American Numbering Council’s Nationwide Number Portability Issues Working Group before taking action on the NOI.”⁶ This Nationwide Number Portability Working Group (“NNP WG”) was recently formed by the Commission, and it should be afforded the opportunity to dissect the complicated technical and regulatory hurdles before the Commission takes further action. Sprint agrees with Neustar that the “NNP WG should take a

⁴ See, Comments of Verizon at p. 6.

⁵ See, Comments of Competitive Carriers Association (“CCA”) at p. 5.

⁶ See, Comments of CTIA at pp. 1-2.

leadership role in developing actionable recommendations for the adoption of an NNP solution.”⁷

Fifth, while Sprint agrees that the N-1 carrier obligation may ultimately be eliminated in an all-IP environment, the N-1 obligation remains necessary in today’s environment. As stated aptly by iconectiv, the N-1 “backstop remains necessary to ensure calls are properly routed and completed and any changes to the current approach ... need to be thoroughly considered by appropriate standards bodies.”⁸ Verizon raises a similar cautionary flag, stating:

If the Commission eliminates the N-1 query rule, for example, service providers still need to ensure that someone in the call flow other than the “N” carrier performs the LNP database query. The Commission should not implement the rule change in a way that would allow a service provider to unilaterally cease performing queries without regard to the impact on consumers and other service providers’ networks and costs.⁹

Sprint agrees with AT&T that “if the Commission eliminates the N-1 query requirement, it must provide clarity as to which provider performs the query to ensure predictability and efficient routing of calls.” In short, as many of the commenters agree, Sprint urges the Commission to tread carefully with respect to the N-1 obligation or risk chaotic call routing/completion.

Finally, Sprint is concerned with comments made by Neustar regarding the elimination of regulations related to ten-digit dialing and dialing plans. Neustar states that “[t]en-digit dialing regulation is unnecessary” and “[d]ialing plan regulations should be eliminated, and each service provider should be able to determine their own dialing plans.”¹⁰ Sprint’s has an opposite view; Sprint believes that dialing plan regulations are necessary for an orderly, uniform approach to NANPA dialing both in today’s environment and also in the future state of all-IP networks and

⁷ See, Comments of Neustar, Inc. at p. 2.

⁸ See, Comments of Telcordia Technologies, Inc. d/b/a iconectiv at p. 2.

⁹ See, Comments of Verizon at p. 5.

¹⁰ See, Comments of Neustar, Inc. at p. 11.

NNP. There would be tremendous customer confusion if each service provider were able to determine their own dialing plan. And, contrary to Neustar's view, Sprint believes the Commission must require ten-digit dialing in order to facilitate NNP. The overwhelming consensus within the telecom industry is that ten-digit dialing is an important, foundational component of NNP. For example, in November 2016, the National Association of Regulatory Utility Commissioners ("NARUC") adopted a resolution that recognized the nexus between NNP, transition to IP-based networks and the importance of ubiquitous ten-digit to achieving these goals.¹¹ In its Resolution, NARUC summarized industry efforts to formally recognize the need for ten-digit numbering including a summary of NANC activities:

In November 2015, the Chief of the Federal Communications Commission's (FCC) Wireline Competition Bureau requested that the NANC evaluate certain issues related to Nationwide Number Portability (NNP). In so doing, the FON WG considered 10-digit dialing in relation to NNP and on May 16, 2016, the NANC submitted a report that included a recommendation that consumers may benefit from consistent dialing patterns (i.e., 10-digit dialing) and a finding that States have the authority to provide more uniform and ubiquitous dialing patterns within a given State ("Report on NNP");

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¹¹ See, NARUC's *Resolution to Adopt a "Best Practices" to Implement a More Ubiquitous 10-Digit Dialing for State Public Utility Commission Efforts*, (Adopted November 16, 2016), available at <https://pubs.naruc.org/pub.cfm?id=2EA80716-B47E-74C4-5C55-3E08D47585F1>

Respectfully submitted,

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